

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
District of Nebraska

United States of America  
v.

Case No. 8:25MJ366

GUADALUPE CABRERA MEJIA

*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 30, 2025, in the county of Douglas in the  
       District of Nebraska, the defendant(s) violated:

*Code Section*

*Offense Description*

42 U.S.C. § 408(a)(7)(B)

False Representation of a Social Security Number

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

☐ Sworn to before me and signed in my presence.

☒ Sworn to before me by telephone or other reliable  
electronic means.

Date: 6/12/2025

City and state: Omaha, Nebraska



*Complainant's signature*

Justin Temperly, SA, HSI

*Printed name and title*



*Judge's signature*

RYAN C. CARSON, U.S. Magistrate Judge

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

8:25MJ366

GUADALUPE CABRERA MEJIA,

Defendant.

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT  
FOR THE ARREST OF GUADALUPE CABRERA MEJIA**

Your Affiant, Justin Temperly, being duly sworn, does depose and state:

**INTRODUCTION AND AGENT BACKGROUND**

1. I, Justin Temperly, am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (hereinafter "HSI"). I have been employed with this agency since January 2024. HSI agents are authorized to investigate violations found in Titles 8, 18, 19 (Customs), and 42 of the United States Code.

2. The information contained in this affidavit is based on my training and experience, my actual knowledge of this investigation, as well as information obtained from other law enforcement officers involved in the investigation.

**PROBABLE CAUSE**

3. On March 12, 2025, HSI Special Agents (SAs) delivered a Notice of Inspection (NOI) of Forms I-9 and subpoena to Glenn Valley Foods in Omaha, Nebraska.

4. HSI received information from the relevant audit period, including a current employee list, current Forms I-9, and scanned copies of identification documents used to prove

work authorization as required by Forms I-9 and 8 U.S.C. § 1324(a). HSI SAs counted one hundred and seventy-seven (177) Forms I-9 with supporting documents.

5. HSI's Auditor received and reviewed the Forms I-9 from Glenn Valley Foods. Multiple law enforcement and government databases were checked to determine the employees' legal work authorization, based upon the documents provided by the employees. These database checks revealed one hundred and seven (107) Forms I-9, which were either supported by suspected fraudulent identification documents or by documents which do not authorize the identified employee to legally work in the United States. The HSI auditor provided your Affiant copies of the Forms I-9 and supporting documents for all employees with suspect identity documents. Your Affiant reviewed the Forms I-9 and the analysis completed by the HSI auditor and concurred with their assessment.

6. One such Form I-9, signed and dated on January 30, 2025, was completed in the name of an individual using the name Alias 1. On the Form I-9, JANE DOE, using the name Alias 1, attested that she was a citizen of the United States by checking the appropriate box on the form. JANE DOE, using the name Alias 1, presented to Glenn Valley Foods a Social Security card bearing a name, Alias 1, and the Social Security number xxx-xx-6520, and a State of Nebraska Department of Motor Vehicles (DMV) Identification Card bearing the name Alias 1 and associated number #V\*\*\*\*567.

7. The Nebraska identification card number was sent to the Nebraska Department of Motor Vehicles (DMV) Fraud Unit for verification. Additionally, the identification card number was checked through the National Law Enforcement Telecommunications System (NLETS). The review of these databases revealed that the Nebraska ID number V\*\*\*\*\*567 was not assigned to anyone and returned as, "NO RECORD FOUND".

8. The HSI Auditor provided your Affiant with ten (10) Federal Trade Commission (FTC) complaints related to employees at Glenn Valley Foods. A victim letter was sent to these individuals requesting they contact HSI. Five (5) victims contacted HSI SAs by phone or email in response, one of whom is a U.S. citizen whose true name is Alias 1.

9. The victim stated they made complaints with the Internal Revenue Service (IRS) and/or Social Security Administration about this identity theft.

10. On Tuesday, June 10, 2025, your Affiant, other Special Agents, and Immigration Officers encountered the individual using the name Alias 1 at Glenn Valley Foods, located at 6824 J Street, Omaha, Nebraska 68117, in the District of Nebraska, during the service of a civil search warrant.

11. The individual using the name Alias 1 was questioned on scene regarding her place of birth, nationality, and real name. At this time, the individual advised she was born in Mexico, is a citizen of Mexico, and her real name is **Guadalupe CABRERA MEJIA**, DOB: XX/XX/1987. Additionally, biometrics, including facial recognition and fingerprints were taken at the scene. These did not provide any identifying information.

12. Officers transported the individual to the Enforcement and Removal Operations office, 1717 Ave. H, Omaha, NE, for processing. During processing, fingerprints taken from the individual using the name Alias 1 were scanned and submitted into the FBI's Integrated Automated Fingerprint Identification System (IAFIS). The IAFIS system compared the fingerprint impressions to fingerprint impressions relating to persons previously arrested by the Department of Homeland Security (DHS) or other law enforcement agencies, which are maintained in the database. This comparison revealed the individual using the name Alias 1 had



been arrested by U.S Customs and Border Patrol in Naco, AZ, on April 18, 2007, April 20, 2007, and April 23, 2007, under the name **Guadalupe CABRERA MEJIA**.

13. Due to **Guadalupe CABRERA MEJIA** having prior CBP encounters, a Fingerprint Identification Number (FIN) was assigned at the time of those encounters to assist in identifying her in the future. The file associated with her FIN contained photographs, fingerprints, and immigration documents identifying her as a citizen or national of Mexico who had no prior criminal removals.

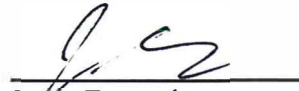
14. As a result of the positive match of fingerprints, your Affiant was able to positively identify the person who is described above as JANE DOE, using the name Alias 1, as **Guadalupe CABRERA MEJIA**. Deportation Officers with Enforcement and Removal Operations (ERO) assigned a unique A# file (A XXXXX3152) to **Guadalupe CABRERA MEJIA** on June 10, 2025.

15. A search of DHS indices failed to produce any current record showing an application had been made for **Guadalupe CABRERA MEJIA** to lawfully enter or be lawfully admitted into the United States.

16. Based on your Affiant's prior investigative experience, undocumented alien employees at similar businesses procure false identification documents and falsely claim U.S. citizenship in order to obtain employment in the United States.

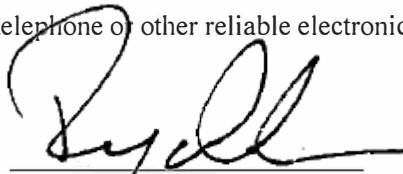
17. Based on these facts, your Affiant has reason to believe **Guadalupe CABRERA MEJIA**, using the name Alias 1, presented fraudulent identification documents to satisfy the requirements of Form I-9 to obtain employment, including falsely representing a Social Security number to be hers, in violation of Title 42, United States Code, Section 408(a)(7)(B).

Your Affiant declares under the penalty of perjury that the foregoing facts and circumstances are true and correct to the best of his knowledge and belief.



Justin Temperly  
Special Agent  
Homeland Security Investigations

SUBSCRIBED and SWORN to before me by telephone or other reliable electronic means this 12th day of June, 2025.



RYAN C. CARSON  
U.S. Magistrate Judge  
United States District Court